

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

CASE NO. 3:04-CV-146-J-99HTS

SEA STAR LINE, LLC,

Plaintiff,

v.

EMERALD EQUIPMENT LEASING,  
INC.,

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant, EMERALD EQUIPMENT LEASING, INC. ("Defendant"), by and through their undersigned attorneys and pursuant to Rule 6, Federal Rules of Civil Procedure, hereby request an extension of time to respond to the Plaintiff SEA STAR LINE LLC's ("Sea Star") Motion for Partial Summary Judgment. In support of this motion, Defendant states as follows:

1. On March 1, 2004, Sea Star filed its Motion for Partial Summary Judgment (Doc. #37) and its Memorandum in Support of that Motion (Doc. #38). On March 2, 2005, Sea Star filed its Appendix to the Motion for Partial Summary Judgment (Doc. #39).

2. Defendant's response to Sea Star's Motion for Partial Summary Judgment is due to be filed on or before March 18, 2005. In order to fully respond to the Motion, Defendant requests an extension of time to file its response to Sea Star's Motion for Partial Summary Judgment, through and including March 31, 2005.

3. Counsel for Sea Star has no objection to the requested extension.

**MEMORANDUM OF LAW**

The Court has broad discretion to enlarge time periods established by Rules of Procedure or Court order. See Woods v. Allied Concord Financial Corp., 373 F.2d 733 (5th Cir. 1967); Fed. R. Civ. P. 6. Furthermore, enlargements of time are appropriate where a party demonstrates a reasonable basis for such request. Beaufort Concrete Co. v. Atlantic States Const. Co., 352 F.2d 460 (5th Cir. 1965).

**CERTIFICATION UNDER LOCAL RULE 3.01(g)**

Counsel for Emerald has conferred with counsel for Sea Star, who advises that he does not oppose the requested extension of time.

WHEREFORE, Defendant respectfully requests that the Court extend the time for Defendant to respond to Sea Star's Motion for Partial Summary Judgment until March 31, 2005.

**SHUTTS & BOWEN LLP**  
300 S. Orange Ave., Suite 1000  
Orlando, Florida 32801-3373  
Mailing Address: **P.O. Box 4956**  
**Orlando, Florida 32802-4956**  
Phone: (407) 423-3200  
Fax: (407) 425-8316

By: /s/ Michael L. Gore  
Michael L. Gore  
Florida Bar No. 441252  
Joey E. Schlosberg  
Florida Bar No. 0079685

- and -

Gary M. Schildhorn, Esq.  
Alan I. Moldoff, Esq.  
**ADELMAN LAVINE GOLD AND LEVIN**  
A Professional Corporation  
Suite 900, Four Penn Center  
Philadelphia, PA 19103-2808  
Phone: (215) 568-7515  
Fax: (215) 557-7922  
**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 9th of March, 2005, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Timothy J. Armstrong, Esq.  
Armstrong & Mejer  
2600 Douglas Road  
Suite 1111, Douglas Center  
Coral Gables, FL 33134

/s/ Michael L. Gore  
Of counsel

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